

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
4 AMIE LITTLEFIELD,)
5 Plaintiff,)
6 vs.) Cause No. 4:21-CV-304-SEP
7 AMERICAN ALTERNATIVE INSURANCE)
8 CORPORATION,)
9 Defendant.)

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12 VIDEOCONFERENCE DEPOSITION OF ADAM COUGHLIN
13 Taken on behalf of Defendant
14 January 27, 2022
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19 JULIE HUNDELT, RPR, CCR, CSR
20 Missouri CCR No. 829
21 Illinois CSR No. 084-004789
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1 during dinner, she had an ice pack on her ankle, and
2 she said it hurt.

3 A Yes, sir.

4 Q So at some point, we'll keep going and
5 progressing here through the day, you leave the
6 station and go to a call.

7 A Yes.

8 Q The call required you to pick someone up at
9 their home and take them to St. Luke's?

10 A I believe so. I don't remember -- and it's
11 not stated in this witness form, I don't believe, as
12 far as where we picked the patient up. But we were
13 transporting to St. Luke's when this injury occurred.

14 Q Anything remarkable or something that you
15 remember about that call before you get to St. Luke's?

16 A No.

17 Q Was Mrs. Standal still wearing an ice pack
18 or favoring her right ankle in any way?

19 A I don't recall.

20 Q So you arrived at St. Luke's, and I assume
21 that you're trying park the ambulance in a certain
22 spot; is that right?

23 A That is correct. We were entering -- so
24 the entrance of St. Luke's, when you pull in,
25 the entrance of the ER, there's a tunnel of sorts with

1 some parking. We were entering from the south side of
2 that entrance coming off of, I believe, I guess that's
3 Conway Road.

4 Q Okay. South side. Is it, is there a
5 description that it gives like an emergency, emergency
6 room drop off, or anything like that?

7 A Yeah, it just says "emergency room." So we,
8 there's a set of doors that we enter in with our
9 patients. There's a set of doors where patients that
10 are walk-in patients will enter. We enter through
11 like a back door to the emergency room. So I was
12 pulling through that tunnel to park by the emergency
13 room doors for EMS personnel.

14 Q Okay. We're going to see how good I am at
15 technology. So I'm going to share with you my screen.
16 I may mark it, I may not. I'm just going to get an
17 idea first of the south side and kind of where we are.
18 So I can -- I'm kind of looking here at a, at that St.
19 Luke's Hospital. Are you referring to an area in
20 this -- we'll be more specific for the record later.
21 But you're talking around here?

22 A No. That doesn't look, that looks like it's
23 on the back side of the hospital. There -- if you
24 move your cursor up and to the right a little ways.
25 So right there, that building or that gray roof.

1 Q Okay.

2 A There's, that's like the main entrance to
3 the hospital.

4 Q Okay.

5 A There to the right, you can see that
6 driveway go down just a hair, right there is a -- that
7 driveway goes into this tunnel. And that's where we
8 were entering the parking area at the time.

9 Q Okay. We will, I will take a break and mark
10 it, I'll do that later. But thank you for pointing
11 that out.

12 All right. So we know where it is you were.
13 Tell me what you recall happening?

14 A So we were, like I said, arriving to the
15 hospital. As I was pulling into the tunnel, there are
16 some parking spaces to the right. I -- a stop sign
17 there. I stopped and I started to proceed into the
18 parking garage and a car began backing up. So I hit
19 the brakes and allowed -- to avoid the accident, avoid
20 hitting this car. Once I stopped, they, they stopped
21 finally. And then I proceeded onto transport the
22 patient to the emergency room.

23 Q Okay. So when you're looking at the -- is
24 this car in front of you or behind you?

25 A It was in front of us.

1 didn't think anything of it at the time.

2 Q Would you describe the stop as, that you
3 made when you hit the brakes as violent or --

4 A I mean I wouldn't -- I mean I guess it
5 depends on your definition of violent. I would --

6 Q How about you use your words. Go ahead.

7 A I would say most likely not. We weren't
8 traveling very fast. Like I said, I couldn't tell
9 you, it had to have been less than 5 miles an hour.
10 You know those are big ambulances and that's a bumpy
11 parking garage. You can't go very fast even if you
12 wanted to. So I would not say it was violent.

13 Q That vehicle that pulled out in front of you
14 -- let me strike that.

15 You were going slow enough in your ambulance
16 so you could avoid hitting that vehicle; correct?

17 A Correct.

18 Q Did you think that person, that the vehicle
19 that was backing out was being careless in any way?

20 A I don't believe they were. I think they
21 just didn't see us. I -- it doesn't say here whether
22 we had our lights and sirens on. That would probably
23 be documented in the EMS report that Amie would have
24 filled out. But I would say no.

25 Q Okay. And that -- you're in the tunnel so

1 it's darker than it would have been -- what time of
2 day do you recall this happening?

3 A She has it listed as approximately 20:00
4 hours, so 8:00 p.m.

5 Q 8:00 p.m. in November, so do you recall it
6 being dark at that point?

7 A I don't recall. Yeah. I don't recall. I
8 think it was dark, but I -- I don't recall.

9 Q No problem. But at least, it was in a
10 tunnel?

11 A Yes.

12 Q Okay. Just to be clear, you stated that you
13 don't believe that that vehicle that was in front of
14 you was being careless in any way?

15 A I don't think they -- I mean I think they
16 just didn't see us.

17 Q Okay. Do you recall whether there were
18 vehicles to the right or the left end parking spots
19 where that vehicle was pulling out?

20 A I don't recall.

21 Q Okay. And essentially that question is to
22 be clear, sometimes they could park in a spot and
23 you're not backing in, but you're pulling in straight
24 frontwise. You can't maybe see past cars that are
25 immediately to your left and your right is why I'm

1 same thing?

2 MR. WINEBRIGHT: Yeah, that's fine.

3 MR. PLUNKERT: Let's try it. If I go right
4 on here?

5 THE WITNESS: Yes, sir.

6 MR. PLUNKERT: I'm sorry, Brian, I'm not
7 trying to -- this is Exhibit C, which I've marked and
8 then there's a red arrow that I put there. That red
9 arrow is denoting where you entered the facility
10 before the subject incident; right?

11 THE WITNESS: Yes, sir.

12 (Exhibit C, Diagram of St. Luke's
13 Hospital, was marked for
14 identification.)

15 MR. PLUNKERT: Okay. Go ahead, Brian.

16 Q (By Mr. Winebright) Then did the car come
17 from your right or your left side?

18 A It would have been from my right.

19 Q Was it backing out of the spot into your
20 lane of travel, or was it backing out of the
21 spot -- strike that. Bad question.

22 Have there been any changes to your
23 knowledge to the layout of that tunnel or the parking
24 spots in the ten or 11 years since this happened?

25 A Not that I'm aware of.

1 A I don't recall. I'm not sure.

2 MR. WINEBRIGHT: Okay. I have nothing
3 further.

4 EXAMINATION

5 QUESTIONS BY MR. PLUNKERT:

6 Q Did you say that you both stopped for a
7 second before that driver proceeded to reverse?

8 A Yes. I think. Yeah.

9 Q I guess that was, that may have been -- I
10 don't know if Brian was asking that, but I'll ask it.

11 Do you remember how far out that vehicle was
12 before it stopped when you were both stopped?

13 A I mean a foot or two. It wasn't --

14 Q Okay.

15 A It wasn't very far.

16 Q Okay. A foot, a foot out of the parking
17 spot or two. Is that what you're saying?

18 A Not fully out, but just the tail end of the
19 car was just out a little ways.

20 Q I see. I see. So at that point, that
21 operator did see you based on your observance that
22 they stopped that car and you both were just kind of
23 sitting there for a second?

24 A Yes.

25 Q I suppose the unspoken thing was you stayed

1 stopped so that they could proceed to pull out and
2 then leave?

3 A Like I said, 11 years ago, I don't know for
4 sure if they pulled out or I let them pull out then I
5 continued on. It seemed like such a nothing incident
6 at the time, I didn't even think to note the type of
7 vehicle or what happened. I --

8 Q Of course. Of course. You're familiar with
9 when you back out of a spot that you may -- if you
10 cannot see from your position in the vehicle, you
11 slowly back out until you can see either way, and then
12 you stop if you see a vehicle coming or going?

13 A Sure.

14 Q What I just described, was that consistent
15 with what you observed and the behavior of the vehicle
16 in front of you?

17 A I would say yes. I can I say they reversed,
18 started coming out. I guess they noted I was there,
19 and they stopped, and I stopped. Impossible to know
20 what the other person is thinking, so I, you know,
21 just tried to be cautious.

22 MR. PLUNKERT: Thank you, sir. Anything
23 else, Brian?

24 MR. WINEBRIGHT: Nothing for me.

25 MR. PLUNKERT: Matt will probably tell you